

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DWIGHT RUSSELL, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	CASE NO. 4:19-CV-00226
	§	
HARRIS COUNTY, TEXAS, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

**STATE INTERVENORS' UNOPPOSED MOTION TO WITHDRAW AS
COUNSEL AND DESIGNATION OF ATTORNEY-IN-CHARGE**

TO THE HONORABLE LEE H. ROSENTHAL:

The State of Texas, the Honorable Greg Abbott, Governor of Texas, and the Honorable Ken Paxton, Attorney General of Texas ("State Intervenor") file this Unopposed Motion to Withdraw as Counsel and Designation of Attorney-in-Charge and respectfully show the Court the following:

1. State Intervenor is represented by the General Litigation Division of the Office of the Attorney General. Special Litigation Counsel Adam Arthur Biggs is currently assigned to this case and has appeared as lead counsel and Attorney-in-Charge. This case has been administratively reassigned to Kimberly Gdula, Assistant Attorney General.

2. Ms. Gdula has already appeared as counsel in this case for State Intervenor.

3. State Intervenor ask this Court to note the withdrawal of Adam Arthur Biggs as counsel for this case and to designate Kimberly Gdula as lead counsel and

Attorney-in-Charge in the above-styled and numbered cause of action, and requests that all future documents on this case be referred to Ms. Gdula at the address shown below.

4. Notice of this intention will be provided to all counsel of record.
5. This motion is unopposed.

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

RYAN L. BANGERT
Deputy First Assistant
Attorney General

ERIC A. HUDSON
Special Counsel
Special Litigation Unit
Texas Bar No. 24059977
Southern District ID: 1000759
Eric.Hudson@oag.texas.gov
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 936-1414 | FAX: (512) 936-0545

DARREN L. MCCARTY
Deputy Attorney General for
Civil Litigation

THOMAS A. ALBRIGHT
Chief for General Litigation Division

/s/ Adam Arthur Biggs
ADAM ARTHUR BIGGS
Special Litigation Counsel
Attorney-in-Charge
State Bar 24077727 | So. Dist. 2964087
Adam.Biggs@oag.texas.gov

MATTHEW BOHUSLAV
State Bar 1303218 | So. Dist. 1303218
Matthew.Bohuslav@oag.texas.gov

TODD A. DICKERSON
State Bar 24118368 | So. Dist. 3544329
Todd.Dickerson@oag.texas.gov

KIMBERLY GDULA
State Bar 24052209 | So. Dist. 1092074
Kimberly.Gdula@oag.texas.gov

CAROLINE ALYSSA MERIDETH
State Bar 24091501 | So. Dist. 3555429
Caroline.Merideth@oag.texas.gov

DOMINIQUE G. STAFFORD
State Bar 24079382 | So. Dist. 3195055
Dominique.Stafford@oag.texas.gov

Assistant Attorneys General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 463-2120 | FAX: (512) 320-0667

CERTIFICATE OF CONFERENCE

I certify I conferred with Neale Mann, Counsel for Plaintiffs, Rachel Fraser, Counsel for Defendant Harris County, and Victoria Jimenez, Counsel for Defendant Sheriff Ed Gonzalez via telephone conversations this week, who each stated that they are not opposed to this motion.

/s/ Adam Arthur Biggs

ADAM ARTHUR BIGGS

Special Litigation Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been sent by electronic notification through ECF by the United States District Court, Southern District of Texas, Houston Division, on September 25, 2020 to all counsel of record.

/s/Adam Arthur Biggs

ADAM ARTHUR BIGGS

Special Litigation Counsel